

# EXHIBIT B

THOMAS J. RHEAUME, JR.

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April 23, 2021

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Jennifer B. Salvatore  
Salvatore Prescott Porter & Porter  
105 E. Main Street  
Northville, MI 48167  
[salvatore@sppplaw.com](mailto:salvatore@sppplaw.com)

Re: *John Doe 1 et al v. Orchard Lake Schools et al.*

Dear Ms. Salvatore,



In response to the subpoena for production of records dated March 31, 2021 and issued by your office, the Archdiocese of Detroit ("AOD") has reviewed its files. The AOD is prepared to immediately produce relevant non-privileged records in its possession. However, the AOD objects to producing such records until entry of an appropriate protective order governing the use of the AOD's records, which are confidential. The Protective Order entered in this matter does not safeguard the AOD's confidential information because it provides that "materials obtained from sources other than the parties to this action . . . shall not be deemed subject to this Protective Order . . . ."

The AOD is prepared to produce its records provided that the parties stipulate to an appropriate protective order that protects use and dissemination of its confidential information. Provided that the parties are in agreement, we will draft an appropriate order. Otherwise, we will be forced to seek an appropriate protective order from the Court.

Very truly yours,

A handwritten signature in blue ink that reads "TJ Rheaume Jr." in a cursive, stylized font.

Thomas J. Rheaume, Jr.

TJR:kd

Enclosure

c: Alex Alexopolous  
Thomas Van Dusen